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7 Attorneys for Defendant

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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 ROBYN ANN WILLIAMS, )  
13 )  
Plaintiff, ) Case No. 2:17-cv-1036-JAD-VCF  
14 )  
v. )  
15 ) **UNOPPOSED MOTION FOR**  
NANCY A. BERRYHILL, ) **EXTENSION OF TIME**  
16 Acting Commissioner of Social Security, ) **(SECOND REQUEST)**  
17 Defendant. )  
18 )

19 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)  
20 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm and  
21 Response to Plaintiff’s Motion for Reversal, due on **September 18, 2017**, by **30 days**, through and  
22 including **October 18, 2017**. This request is made in good faith with no intention to unduly delay the  
23 proceedings.

24 An extension of time is needed because this case was recently reassigned to the undersigned  
25 agency counsel, whose existing work commitments preclude him from adequately researching the  
26

1 factual and legal issues in the instant case prior to September 18, 2017. In particular, on September 11  
2 and 12, 2017, the undersigned agency counsel participated in last-minute, work-related travel to present  
3 oral arguments in a case before the Central District of California and conduct a training presentation for  
4 the agency's Downtown Los Angeles Office of Disability Adjudication and Review. Moreover, the  
5 undersigned agency counsel is currently responsible for performing a range of tasks concurrent with  
6 drafting the Commissioner's brief in the instant case, including: drafting briefs and summary judgment  
7 motions and negotiating (or litigating) attorney fees in cases before federal district courts; drafting the  
8 Commissioner's answering brief in a Social Security case before the Ninth Circuit; preparing for a  
9 hearing in personnel-related litigation pending before the Merit Systems Protection Board; overseeing  
10 ongoing discovery in personnel-related litigation before the Equal Employment Opportunity  
11 Commission; assisting with nationally implementing the terms of a class action settlement where the  
12 agency was a party; and preparing training materials and conducting presentations for the agency's  
13 Office of Disability Adjudication and Review.

14 Counsel for Defendant conferred with Plaintiff's counsel, Cyrus Safa by email on September 14,  
15 2017, who has no opposition to this motion.

16 Respectfully submitted this 14th day of September 2017.

17  
18 STEVEN W. MYHRE  
Acting United States Attorney

19 /s/ Asim H. Modi  
20 ASIM H. MODI  
Special Assistant United States Attorney

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22 OF COUNSEL:

23 DEBORAH LEE STACHEL  
24 Regional Chief Counsel, Region IX  
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: September 22, 2017

1 **CERTIFICATE OF SERVICE**

2 I, Asim H. Modi, certify that the following individuals were served with the foregoing  
3 **UNOPPOSED MOTION FOR EXTENSION (SECOND REQUEST)** on the date and via the  
4 method of service identified below:

5 **CM/ECF:**

6 Gerald M. Welt  
7 Gerald M. Welt, Chtd.  
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11 Cyrus Safa, Esq.  
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14 Santa Fe Springs, CA 90670  
15 cyrus.safa@rohlfindinglaw.com

16 Dated this 14th day of September 2017.

17 //s// Asim H. Modi  
18 ASIM H. MODI  
19 Special Assistant United States Attorney  
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